



20 November 2018

Marlene H Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, D.C 20554

Dear Ms Dortch

**COMMENT ON SPRINT PETITION FOR RULEMAKING TO REFORM THE COMMISSION'S  
RATEMAKING METHODOLOGY FOR IP RELAY SERVICE**

**CG Docket Nos. 03-123 and RM 11820**

T-Meeting Global AB is an established technology provider of a modern standards-based form of IP Relay that has its basis in ITU-T F.703 Total Communications supporting a multimedia conversation with wideband audio, HD video and RFC 4103 real-time text.

We respectfully submit the following comments:

1. Sprint states "Certain categories of consumers rely on IP Relay service as their sole or primary means of communicating by telephone, including consumers who are deaf-blind or have speech disabilities as well as deaf or hard-of-hearing consumers who do not know or are not comfortable with the use of American Sign Language." The reason that this group of consumers relay on IP Relay is because there is no modern alternative to the legacy IP Relay service offered by Sprint in the USA. Total Communications rendered IP Relay obsolete in other markets a decade ago.
2. Rather than perpetuate a situation in which American consumers are trapped with legacy technology, T-Meeting submits that the Commission should assign its considerable policy resources into opening the way for Total Communications services to be available to consumers in the USA, thus meeting the tenets of the Americans with Disabilities Act in a modern context.
3. Total Communications is delivered over wired and wireless Internet connections making calls to 911 possible inside and outside the home.
4. Total Communications utilising RFC 4103 RTT supports Braille devices using a Bluetooth connection to PC, Mac, Android or iOS tablets and smartphone devices. Variable zooming of text and icons and different color choices as well as combining both directions of text into a single pane all adapt to the deafblind user's vision loss. The video component of Total



Communications, not supported by IP Relay, allows CA's to see visual clues of what a speech impaired person is trying to articulate.

5. It is unsurprising that Sprint is now the lone provider of legacy IP Relay service in the USA given that state relay administrators and others have become aware of what modern relay services can deliver based on e.g. the presentation by representatives of the Norwegian Labour and Welfare Administration's Video Interpreting Service at NASRA 2018.
6. The termination of IP Relay service would not be severe if the Commission created a favourable regulatory landscape that encouraged the introduction of modern relay services to the USA.
7. T-Meeting encourages the Commission to devote its considerable resources not to the perpetuation of the use of legacy technology but rather to opening the USA to modern relay services by rolling back the restrictive regulations that hinder the uptake of modern relay services by American consumers that have been available in Europe since 2001.
8. Given that Sprint is the only supplier of legacy IP Relay service in the USA, we submit that the MARS methodology is irrelevant in a single provider environment and that its use is therefore not sensible as an input to setting IP Relay compensation.
9. Sprint appears to want a measure of certainty that its IP Relay improvement investments will be recoverable. We question why a legacy service now offered by only one provider should be improved and suggest that the correct course would be to replace it with a standards-based non-proprietary service that does not perpetuate the relay silos (text based relay, STS, IP Relay IPCTS, VRS etc) that prevent the introduction of a modern multi-media service enjoyed by consumers in other countries.
10. Sprint proposes that its suggested rate making methodology 'should ensure that IP Relay users continue to have access to this service for many years to come.' T-Meeting submits that if American consumers knew what was possible for them using modern technology and the Commission created an environment that encouraged the deployment of ITU-T F.703 based multi-media relay services that consumers would promptly abandon legacy IP Relay.

Yours sincerely

Paul Buckrell CMEngNz  
International Business Coordinator  
T-Meeting Global AB